

1 SAO
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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 J.M. and I.M., minors by and through their natural
13 parent and guardian, JESSICA HARGROVE,

CASE NO.: 2:14-cv-01197-JAD-NJK

14 Plaintiffs,

15 vs.

16 ANDREA HERNANDEZ; WALDO
17 HERNANDEZ; ANITA MOODY; LISA
18 BROCHU; KIM KALLAS; LISA RUIZ-LEE;
19 PAULA HAMMACK; DOE Individuals I-X;
20 ROE CLARK COUNTY DEPARTMENT OF
21 FAMILY SERVICES EMPLOYEES XI-XX,
22 individually and in their official capacities;
23 COUNTY OF CLARK, a political subdivision of
24 the State of Nevada; and ZOE CORPORATIONS
25 XXI-XXX,

26 Defendants.

27 **STIPULATION AND PROPOSED ORDER TO EXTEND DUE DATE FOR PLAINTIFF'S**
28 **RESPONSE TO DEFENDANTS KIM KALLAS, LISA RUIZ-LEE, PAULA HAMMACK,**
AND COUNTY OF CLARK'S MOTION TO COMPEL PLAINTIFF TO APPEAR FOR
DEPOSITION (FIRST REQUEST)

29 Pursuant to LR 7-1 and 7-2, the parties, by and through their respective counsel of record,
30 hereby stipulate and agree to extend the due date for Plaintiffs' response to Defendants' Motion to
31 Compel Jessica Hargrove to Appear for Deposition from October 18, 2015 to October 23, 2015,
32

1 and respectfully request that this Court approve this stipulation and enter an Order reflecting the
2 same. This extension has become necessary due to scheduling conflicts arising from Plaintiff's
3 counsel's trial calendar.

4 DATED this 19th day of October, 2015.

DATED this 19th day of October, 2015.

5 GANZ & HAUF

OLSON CANNON GORMLEY ANGULO &
STOBERSKI

6
7 /s/ Cara Xidis, Esq.

/s/ Felicia Galati, Esq.

8 MARJORIE HAUF, ESQ.

FELICIA GALATI, ESQ.

9 Nevada Bar No. 8111

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10 Nevada Bar No. 11743

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8950 W. Tropicana Avenue, Suite 1

Attorney for Defendants, Anita Moody, Kim

11 Las Vegas, Nevada 89147

Kallas, Lisa Ruiz-Lee, Paula Hammack, and
County of Clark

12 Attorney for Plaintiffs

13 **ORDER**

14 This matter having been stipulated to by the parties, through their respective counsel, and
15 the Court being otherwise duly advised;

16 IT IS HEREBY ORDERED that the due date for Plaintiff's response to Defendants Kim
17 Kallas, Lisa Ruiz-Lee, Paula Hammack, and County of Clark's Motion to Compel Plaintiff to
18 Appear for Deposition to be extended from October 18, 2015 to October 23, 2015.
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21 DATED: October 20, 2015

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25 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

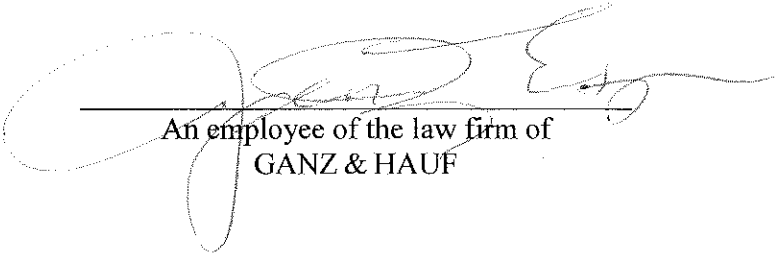
Pursuant to FRCP 5, I certify that on this date, I served the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND DUE DATE FOR PLAINTIFF'S OPPOSITION TO DEFENDANTS KIM KALLAS, LISA RUIZ-LEE, PAULA HAMMACH AND COUNTY OF CLARK'S MOTION TO COMPEL PLAINTIFF TO APPEAR FOR DEPOSITION** through the CM/ECF system of the United States District Court for the District of Nevada, upon the following:

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Attorney for Defendants, Hernandez

Dated this 19 day of October, 2015.


An employee of the law firm of
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